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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE ALLERGAN GENERIC DRUG PRICING
SECURITIES LITIGATION

Case No. 2:16-cv-09449 (KSH) (CLW)

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
SETTLEMENT AND PLAN OF ALLOCATION**

To: All Counsel by ECF

COUNSEL:

PLEASE TAKE NOTICE that on November 17, 2021, at 1:00 p.m. in Courtroom 4D of
the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, or by

telephone or video conference (in the discretion of the Court), before the Honorable Cathy L. Waldor, Lead Plaintiffs Sjunde AP-Fonden and Union Asset Management Holding AG (collectively, “Lead Plaintiffs”), by and through their undersigned counsel, will and hereby do move the Court for orders granting Lead Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation under Federal Rule of Civil Procedure 23 which will: (i) grant final approval of the proposed settlement of the above-captioned securities class action (“Settlement”) on the terms set forth in the Stipulation and Agreement of Settlement dated as of July 8, 2021 (ECF No. 223-1); and (ii) approve the proposed plan for allocating the net proceeds of the Settlement to the Settlement Class.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, the undersigned intend to rely on the accompanying Memorandum of Law and the accompanying Joint Declaration of Matthew L. Mustokoff and John C. Browne and exhibits attached thereto, and the papers and pleadings filed in this Action, the arguments of counsel, and any other matters properly before the Court.

PLEASE TAKE FURTHER NOTICE that, proposed orders granting the relief requested herein will be submitted in connection with Lead Plaintiffs’ reply submission, which will be filed no later than November 10, 2021, pursuant to the Court’s July 30, 2021 Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement (ECF No. 228).

Dated: October 13, 2021

Respectfully submitted,

s/ James E. Cecchi

James E. Cecchi

Donald A. Ecklund

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CERTIFICATION OF SERVICE

I hereby certify that on October 13, 2021, I caused a true and correct copy of the foregoing Notice of Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation to be electronically filed with the Clerk of the Court using the ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 13, 2021

s/ James E. Cecchi

James E. Cecchi

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